

EXHIBIT I

From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Thursday, March 14, 2024 4:14 PM
To: Jonathan Bright
Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater; qe-headwater103@quinnemanuel.com
Subject: Re: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

[This email originated outside of F&R.]

Jonathan,

Headwater does not oppose your motion for leave to amend invalidity contentions in the -103 matter for the amended contentions linked in your March 8, 2024 email.

Regards,

Jason Wietholter

Russ, August & Kabat

12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025

Main +1 310 826 7474 | jwietholter@raklaw.com | www.raklaw.com

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On Mar 14, 2024, at 10:35 AM, Jason Wietholter <jwietholter@raklaw.com> wrote:

Hi Jonathan,

Can you please let us know what additional third party discovery or art you intend to add beyond the contentions identified in your March 8 email, if any?

Regards,

Jason Wietholter

Russ, August & Kabat

12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025

Main +1 310 826 7474 | jwietholter@raklaw.com | www.raklaw.com

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On Mar 14, 2024, at 8:31 AM, Jonathan Bright <jbright@fr.com> wrote:

Counsel,

Despite our multiple emails, you have yet to provide any response to our multiple emails regarding Samsung's motion for leave to amend invalidity contentions in the -103 matter. We ask for a fourth time, does Headwater oppose our request to amend these invalidity contentions? Headwater's continued silence on this issue prejudices Samsung.

We are available to meet and confer today at 3PM ET and will open the following Zoom link at that time: <https://fish.zoom.com/j/9293566268>

Regards,

Jonathan

From: Jonathan Bright <jbright@fr.com>

Sent: Tuesday, March 12, 2024 8:38 PM

To: rak_headwater@raklaw.com

Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; qe-headwater103@quinnemanuel.com

Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel,

It has been over two weeks since we notified you of our planned motion for leave to amend invalidity contentions in the -103 matter and requested your position as to whether Headwater opposes this motion. Please provide Headwater's position promptly. If Headwater intends to oppose, please also provide your availability this week for a meet-and-confer.

Best,

Jonathan

From: Jonathan Bright <jbright@fr.com>

Sent: Friday, March 8, 2024 10:35 PM

To: rak_headwater@raklaw.com

Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; qe-headwater103@quinnemanuel.com

Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel,

Following up on our emails below, please let us know whether Headwater will oppose Samsung's motion for leave to amend Invalidity Contentions in the 103 case. These

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amended invalidity contentions are available at the following link: <https://send.fr.com/link/jDydAonxbmg3dAdNbApNYB>.

Password to follow separately.

Best,

Jonathan

From: Jonathan Bright

Sent: Friday, February 23, 2024 9:09 PM

To: Rae Crisler <crisler@fr.com>; rak_headwater@raklaw.com

Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; ge-headwater103@quinnemanuel.com

Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel,

Following up on our emails below, Samsung hereby notifies Headwater that it plans to move for leave to amend its Invalidity Contentions (previously served on November 30, 2023) to incorporate material specified in Samsung's supplemental responses to Headwater Interrogatory No. 1, including third party discovery served since Samsung's supplemental responses.

Please provide Headwater's position on Samsung's forthcoming motion for leave to amend its Invalidity Contentions.

Best,

Jonathan

From: Rae Crisler <crisler@fr.com>

Sent: Monday, February 12, 2024 11:30 AM

To: rak_headwater@raklaw.com

Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; ge-headwater103@quinnemanuel.com

Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel,

We write to further advise that Samsung has continued to diligently pursue third party discovery as reflected in its Second Supplemental Response to Plaintiff's Interrogatory No. 1 served on February 6, 2024, that incorporates content from Nokia and Google.

As noted below, for purposes of notice and status as to third party discovery, Samsung expects to receive additional third party discovery responses in the coming weeks and may well further supplement its interrogatory No. 1 as well as its Invalidity Contentions with additional documents and things obtained as a result of that discovery.

Best regards,

Rae

Rae Crisler :: Fish & Richardson P.C. :: 214-760-6138 direct

From: Jonathan Bright <jbright@fr.com>
Sent: Friday, January 12, 2024 9:59 PM
To: rak_headwater@raklaw.com
Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; ge-headwater103@quinnemanuel.com; Jeannet Santos <jsantos@fr.com>
Subject: RE: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel:

In relation to the supplemental response to Plaintiff's interrogatory No. 1 referenced below, Samsung has diligently pursued third party discovery and we notify you that Defendant Samsung intends to supplement its Invalidity Contentions with content from third party OpenWave specified in that supplemental response.

For purposes of notice and status as to third party discovery, Samsung expects to receive additional third party discovery responses in the coming weeks and may well further supplement its interrogatory No. 1 as well as its Invalidity Contentions with additional documents and things obtained as a result of that discovery.

Regards,

Jonathan

From: Jeannet Santos <jsantos@fr.com>
Sent: Friday, January 12, 2024 4:55 PM
To: rak_headwater@raklaw.com
Cc: [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>
Subject: Headwater v. Samsung Case No. 2:22-cv-103: 2024-01-12 CONF Samsung Suppl Resp to HW 1st Set of ROG's No 1

Counsel:

Attached for service, please find:

- **DEFENDANTS' SUPPLEMENTAL OBJECTIONS AND RESPONSES TO HEADWATER RESEARCH LLC'S FIRST SET OF INTERROGATORIES (NO. 1)**

The password to this document will be sent in a separate email.

Thank you,

Jeannet T. Santos, Sr. Litigation Paralegal

PUBLIC VERSION

Supporting: Ashley A. Bolt, Brian P. Boyd, Erin P. Alper, Noah C. Graubart, & Steffen C. Lake

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“The Strength of the Team is each Member. The Strength of each Member is the Team.” –Phil Jackson

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